

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

*In Re: Platinum And Palladium Commodities
Litigation*

MASTER FILE
No. 10 Civ. 3617 (WHP)

This Document Relates To:

Platinum/Palladium Futures Action

**DECLARATION OF EDWARD W. COCHRAN IN SUPPORT OF LEAD COUNSEL'S
MOTION FOR AN AWARD OF ATTORNEYS' FEES
AND REIMBURSEMENT OF EXPENSES**

I, Edward W. Cochran, pursuant to 28 U.S.C. Section 1746, hereby declare as follows:

1. I am an attorney practicing in Cleveland, Ohio. I graduated from Harvard University in 1971 and Columbia Law School in 1975. I have been practicing exclusively in litigation since 1975. I have worked on over 300 class actions in my career.

2. Since the inception of this case in April 2010, I have acted as co-counsel for certain individuals and entities acting as proposed class representatives in the Futures Action, including Harry Ploss and The Stuart Sugarman Trust. I have assumed the responsibility of dealing with such proposed class representatives as, and to the extent, requested by Court appointed counsel Lovell Stewart Halebian Jacobson LLP ("Lovell Stewart").

3. I respectfully submit this declaration in support of Lead Counsel's Motion for an Award of Attorneys' Fees and Reimbursement of Expenses.

4. The tasks I undertook in connection with this action include, but are not limited to, the following: (a) vetting the qualifications and individual facts of certain proposed class representatives, (b) educating and informing proposed class representatives as to the

requirements and status of the case, and (c) coordinating discovery required of proposed class representatives.

5. In total, I spent 73.8 hours in connection with this litigation for which an award of legal fees is being requested. My current hourly rate is \$575.00. Thus, the lodestar value of my firm's fee compensable time is \$42,435.00.

6. I am not seeking reimbursement of any expenses.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on January 14, 2015

/s/ Edward W. Cochran
Edward W. Cochran